

Plaintiff and Defendants jointly submit this status update regarding discussions to settle Plaintiff's claims for attorneys' fees and costs. As background, the parties state the following.

On April 12, 2019, the parties sought a 60-day stay until June 11, 2019 to facilitate settlement discussions regarding Plaintiff's claims for attorneys' fees and costs, which the Court granted on April 25, 2019. ECF Nos. 60, 61. On June 11, 2019, the parties sought a further 30-day stay, until July 11, 2019, to continue their discussions, which the court granted on July 9, 2019. ECF Nos. 61, 62. The parties informed the Court that they would provide a status update and joint proposal regarding the remaining deadlines in this matter on or before July 11, 2019, if settlement was unsuccessful. The parties have engaged in settlement discussions, but these discussions have thus far been unsuccessful in resolving Plaintiff's claims. While the parties remain amenable to continuing discussions to resolve this issue without the Court's involvement,

they believe at this time that it would be most productive to enter a briefing schedule for Plaintiff's fee petition. To that end the parties propose the following briefing schedule.

- Plaintiff is to file his fee petition (including all supporting briefing) on or before Monday, August 12, 2019;
- Defendants are to file any opposition to Plaintiff's fee petition on or before Thursday, September 12, 2019; and
- Plaintiff is to file any reply in support of his fee petition on or before Thursday, September 26, 2019.

WHEREFORE, the parties respectfully request that the Court enter the above briefing schedule for Plaintiff's fee petition.

Dated: July 11, 2019

Respectfully submitted,

/s/ Robert Frederickson III

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*Attorneys for Plaintiff*

IT IS SO ORDERED this \_\_\_\_\_ day of \_\_\_\_\_, 2019.

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Hon. Denise J. Casper, U.S.D.J.

**CERTIFICATE OF SERVICE**

I, Robert Frederickson III, hereby certify that a copy of the foregoing document, filed through the CM/ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies shall be served by first class mail postage prepaid on all counsel who are not served through the CM/ECF system on July 11, 2019.

/s/ Robert Frederickson III  
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